

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LAWRENCE W. HAMMARE,

Plaintiff,

vs.

THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA, and T-  
MOBILE USA, INC.,

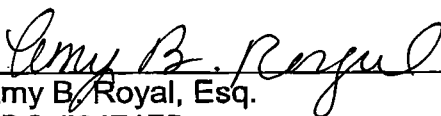
Defendants.

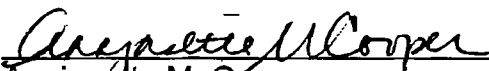
CIVIL ACTION NO. 05-30155-MAP

**DEFENDANT'S LOCAL RULE 16.1 CERTIFICATION**

Pursuant to Local Rule 16.1, the Defendant, T-Mobile USA, Inc., and its counsel, Skoler, Abbott & Presser, P.C., hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course of the captioned litigation through trial and have discussed Alternative Dispute Resolution ("ADR") programs and the costs of resolving the captioned litigation through an ADR program.

Respectfully submitted,

  
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Tel.: (413) 737-4753/Fax: (413) 787-1941  
Dated: September 19, 2005

  
Annjanette M. Cooper  
Corporate Counsel, Employment & Labor  
T-Mobile USA, Inc.

Dated: September 19, 2005